

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

MDL NO. 2875

HON. ROBERT B. KUGLER

**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF MERILYN ANDRE**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Princeton Pharmaceutical, Inc., and Solco Healthcare U.S., LLC will take the deposition upon oral examination of Marilyn Andre on November 30, 2021 at 12:00 p.m. EST (9 a.m. PST) at 14032 Woodlawn Ave, Tustin, California 92780 and to continue on December 7, 2021 at 12:00 p.m. EST (9 a.m. PST) as necessary.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera.

The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition is:

Lauren E. Pugh
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Date: November 22, 2021

Respectfully submitted,

/s/ Lauren E. Pugh

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*Attorney for Defendants Princeton
Pharmaceutical Inc., Zhejiang Huahai
Pharmaceutical Co., Ltd., Solco Healthcare
U.S., LLC, and Huahai U.S., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Marilyn Andre was served upon the following by e-mail, with copies to all counsel of record via service on ECF:

John Davis, Esq.
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Attorney for Plaintiff

/s/ Lauren E. Pugh
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